

MELINDA HAAG (CABN 132612)
 United States Attorney
 THOMAS MOORE (ALBN 4305-078T)
 Assistant United States Attorney
 Chief, Tax Division
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 Telephone: (415) 436-7017
 Fax: (415) 436-7009

Attorneys for United States

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	
)	No. C-11-1579 JSW
Plaintiff,)	
)	
v.)	
)	
GEORGE WOLFF aka GEORGE)	STIPULATION AND PROPOSED ORDER
WILLIAM WOLF; GEORGE WILLIAM)	EXTENDING SUMMARY JUDGMENT
WOLFF as TRUSTEE OF THE)	RESPONSE DEADLINE
DICKSMOOR REVOCABLE TRUST;)	
CBSJ FINANCIAL CORP., SAN)	
FRANCISCO COUNTY TAX)	
COLLECTOR; STATE OF CALIFORNIA)	
FRANCHISE TAX BOARD,)	
)	
Defendants.)	

STIPULATION

Plaintiff, United States of America (“Plaintiff”) and Defendants, George Wolff a/k/a George William Wolff and George William Wolff as Trustee of the Dicksmoor Revocable Trust (“WOLFF”), by and through their undersigned counsel, stipulate as follows:

1. A Motion For Summary Judgment (DE 19) was filed by Plaintiff on January 27, 2012.
2. That the deadline for Defendant WOLFF to respond to the Motion For Summary Judgment is February 10, 2012.
3. That the parties have negotiated a good faith settlement which is subject to approval from the Plaintiff’s authorized official representative and for which approval may not be secured by the deadline of February 10, 2012.

1 4. The parties' settlement of this matter has been forwarded to the Department of
2 Justice, Tax Division, for its authorization to either accept or reject the proposed settlement
3 agreement. In the event the settlement agreement is approved this matter will be concluded upon
4 prompt compliance with the terms of the settlement agreement.

5 5. The Plaintiff and Defendant WOLFF hereby agree to extend the deadline for
6 Defendant WOLFF's written response to the Motion For Summary Judgment to February 17, 2012.
7 Dated: February 9, 2012.

8 MELINDA HAAG
9 United States Attorney

10 _____
11 /s/
12 THOMAS MOORE
13 Assistant United States Attorney
14 Chief, Tax Division

15 Attorneys for the United States

16 _____
17 /s/
18 JEFFREY B. KAHN
19 Attorney for Defendants
20 George William Wolff and
21 George William Wolff
22 as Trustee of the Dicksmoor Revocable Trust

23 **ORDER**

24 Pursuant to the Stipulation above, the deadline for Defendant WOLFF to respond to the
25 Motion For Summary Judgment in the above captioned matter is extended to February 17, 2012.

26 February 10, 2012

27 Dated _____

28 _____
29 Jeffrey S. White
30 JEFFREY S. WHITE
31 United States District Judge